

SELF AUDIT DISCLOSURE REPORT CORRECTIVE ACTION PLAN

Updated as of: June 20, 2008

Facility Name: Bok High School #2090
Facility Address: 1901 S. 9th Street, Philadelphia, PA 19148
Date of Audit: 05/13/08
Date CAP Due to EPA: 7/12/08

Finding Number	Regulatory Citation	Finding	Corrective Action	Corrective Action Status (include date when closed)	Preventative Measure	Preventative Measures Status (include date when closed)	Extension Filed (Y/N)	Exhibit Reference	Approximate Cost to Close Finding	Potential Reduction of Pollutants *INCLUDE AMT OF OIL
ASBESTOS HAZARD EMERGENCY RESPONSE ACT (AHERA) PROGRAM 40 CFR § 763 Subpart E										
1	(40 CFR § 763.85(b))	The school is required to complete Three Year Re-inspections. Data gaps were identified following the 2000 and 2004 Re-inspection reports.	The school must complete the Re-inspections every 3 years. This is a historical finding as the school can not complete missing data gaps.	Historical finding. Corrective Action can not be completed.	A compliance calendar should be established and implemented to ensure the timely completion of the Three Year re-inspections.	In Progress - A draft compliance calendar was created by URS for tracking the Three Year Re-inspection and is currently being reviewed by the School District.	N	1	N/A	Recordkeeping violation
2	(40 CFR § 763.85(b)(1)(vii))	The regulations require that the Three Year Re-inspections records be updated within 30 days of the inspection. The most recent Re-inspection Report is dated November 2007 and was available for review at the central file and the school building; however it was recently distributed and was not completed within the required 30 day time frame from the inspection date of November 2007	The Three Year Re-inspection records must be updated within 30 days of the actual inspection. This is a historical finding.	Historical finding. Corrective Action can not be completed.	A compliance calendar should be established and implemented so that the 30 day update can be tracked by the personnel in the central office for the next Three Year Re-inspection in 2009.	In Progress - A draft compliance calendar was created by URS for the 30 day tracking of the Three Year Re-inspections and is currently being reviewed by the School District.	N	2	N/A	Recordkeeping violation
3	(40 CFR § 763.94)(d)	The school is required to complete Six Month Periodic Surveillance Inspections. Varied data gaps exist between the Six Month Periodic Surveillance Inspections from 1989 to 2007, ranging from 1 to 17 months.	The school must complete Periodic Surveillance Inspections every 6 months. This is a historical finding as the school can not complete past missed inspections.	Historical finding. Corrective Action can not be completed.	A compliance calendar should be established and implemented to ensure the timely completion of the Six Month Periodic Surveillance Inspections.	In Progress - A draft compliance calendar was created by URS for tracking the Six Month Inspections and is currently being reviewed by the School District.	N	3	N/A	Recordkeeping violation

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4	(40 CFR § 763.94)	The regulations require the school to maintain all Operations and Maintenance (O&M) records, only partial records were found at the school.	Prepare copies of the missing O&M records and distribute to the administration office for inclusion in the management plan. The following reports were not found at the school. ETC A07-1029-05 10/29/07 Synertech 010-2850 7/31/07 USA 06-010001-184 4/27/06 Synertech 010-2716 10/31/06 USA 05-010001-366 11/15/05 USA 05-010001-136 3/22/05 USA 05-010001-53 2/9/05 USA 05-010001-54 3/8/05 Synertech 010-2284 1/31/05 Synertech 010-2283 1/31/05 USA 05-010001-310 10/24/05 USA 04-010001-72 5/19/04 USA 04-010001-75 6/9/04 USA 04-010001-400 12/15/04 USA 04-010001-342 11/16/04 USA 04-010001-210 8/26/04 USA 04-010001-211 9/9/04 Synertech 010-2230 8/31/04 Synertech 010-2229 8/31/04 Synertech 010-2122-11 8/31/04	6/20/08- Copies of the missing response actions were prepared by the School District and distributed to the School for their records.	A letter should be sent to all school administrators reminding them of the AHERA record keeping procedures and the importance of maintaining all asbestos documentation.	6/20/08-The Re-inspection Reports were submitted with a letter titled "AHERA Compliance Update Reports" from the Office of Capital Programs regarding the importance of maintaining these reports with the management plan records.	N	4	\$600	Recordkeeping violation
5	CFR § 763.93 (g)(3)	The original management plan dated 1988 and the 1995 (yellow binder) and 1998 (green binder) was not found at the school.	Prepare a copy from the central file and send to the school .	6/20/08- A Copy of the missing Re-inspection Report were prepared by the School District and distributed to the School for their records.	Include notification letter instructing the principal to maintain with the other files.	6/20/08-The Re-inspection Reports were submitted with a letter titled "Mandated Federal EPA AHERA Documents" from the Office of Capital Programs regarding the importance of maintaining these reports with the management plan records.	N	5	\$400	Recordkeeping violation